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IDAHO PUBLIC
UTILITIES COMMISSION

1407 W. North Temple, Suite 310
Salt Lake City, Utah 84116

February 25, 2016

VIA OVERNIGHT DELIVERY

Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702

Attn: Jean Jewell
Commission Secretary

**Re: CASE NO. PAC-E-14-11 COMPLIANCE FILING
IN THE MATTER OF THE APPLICATION OF PACIFICORP D/B/A ROCKY
MOUNTAIN POWER AND IDAHO POWER COMPANY FOR AN ORDER
AUTHORIZING THE EXCHANGE OF CERTAIN TRANSMISSION ASSETS.**

Dear Ms. Jewell:

Rocky Mountain Power, a division of PacifiCorp, in compliance with Commission Order No. 33313 dated June 5, 2015, hereby respectfully submits this letter and a copy of the journal entries at closing recording the transaction and exchange of certain transmission assets between PacifiCorp and Idaho Power Company.

Additionally, the Company would like to respond to Commission Order No. 33313 which stated:

"The record is not as clear for the treatment of reduced expenses to PacifiCorp customers. We note that PacifiCorp has not previously deferred transmission costs due to the Legacy Agreements for future recovery. To further evaluate the reduced wheeling expenses associated with this transaction, we direct PacifiCorp to establish a regulatory account deferring these reduced wheeling expenses. Proper regulatory treatment will be determined in a future rate case when the details are known."

Pursuant to Order No. 30904, which authorized the establishment of the energy cost adjustment mechanism ("ECAM") effective July 1, 2009, the Company began tracking FERC account 565 - Transmission of Electricity by Others, or wheeling expense, along with other variable net power cost expenses. Through the ECAM, actual expenses are compared to the base level established in the most recent general rate case with variances deferred and reviewed

annually. It is the Company's belief that the ECAM satisfies the Commission's order by establishing a regulatory account to defer any changes to wheeling expenses and provides an opportunity for proper regulatory review. Unless otherwise directed the Company believes no additional accounting treatment is necessary.

Please direct any informal inquiries to Ted Weston, Idaho Regulatory Affairs Manager, at (801) 220-2963.

Sincerely,

A handwritten signature in blue ink that reads "Jeffrey K. Larsen/cm". The signature is written in a cursive, flowing style.

Jeffrey K. Larsen

Vice President, Regulation

PACIFICORP
CLOSING JOURNAL ENTRIES

Closing journal entries to exchange undivided ownership interests in equipment between PacifiCorp and Idaho Power Company to provide the parties with transmission capacity that better aligns with the current configuration of the parties respective transmission systems

#	<u>FERC</u> <u>Account</u>	<u>Description</u>	<u>Debit</u>	<u>Credit</u>
1.	102	Electric plant purchased or sold	43,497,754	
	108	Accumulated provision for depreciation of electric plant	29,896,321	
	101	Electric plant in service		73,394,075
		<i>To classify the exchange of the undivided ownership interest in assets to Idaho Power Company from Electric plant in service to FERC account 102 - Electric plant purchased or sold in accordance with 18 CFR, Part 101, Electric Plant Instruction 5.</i>		
2.	102	Electric plant purchased or sold	159,538	
	131	Cash		159,538
		<i>To record cash payment to Idaho Power Company for the differing values resulting from the netting of the exchange prices.</i>		
3.	102	Electric plant purchased or sold	1,270,131	
	186.1	Sales of electric utility facility		1,267,822
	131	Cash - WA real estate excise tax		2,309
		<i>To record transaction costs incurred by PacifiCorp to facilitate the exchange of undivided ownership interest in assets with Idaho Power Company.</i>		
4.	101	Electric plant in service	64,161,036	
	114	Electric plant acquisition adjustment	1,270,131	
	108	Accumulated provision for depreciation of electric plant		20,503,744
	102	Electric plant purchased or sold		44,927,423
		<i>To clear account FERC account 102 - Electric plant purchased or sold to Electric plant in service, Electric plant acquisition adjustment and Accumulated provision for depreciation for the value of the undivided ownership interest in assets received from Idaho Power Company.</i>		
5.	409.1	Income taxes, utility operating income	4,892,268	
	236	Taxes accrued		4,892,268
	282.1	Accumulated deferred taxes	4,892,268	
	411.1	Provision for deferred income taxes		4,892,268
		<i>To record current and deferred tax of undivided ownership interest in assets exchanged with Idaho Power Company.</i>		
6.	282	Accumulated deferred income taxes - Other property	7,087,064	
	411.2	Provision for deferred income taxes - Credit, other income and deductions		7,087,064
		<i>To record the reversal of the accumulated deferred income tax balance on the relinquished property method life differences.</i>		
7.	410.2	Provision for deferred income taxes, other income and deductions	7,087,064	
	282	Accumulated deferred income taxes - Other property		7,087,064
		<i>To establish the accumulated deferred income tax balance (non-rate base offsetting) on the replacement property basis difference.</i>		

Note: The amounts shown are based on closing values and are as of December 31, 2014. These amounts are subject to a true-up adjustment within 180 days after the closing of the exchange. Final journal entries will be filed after that has occurred.